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Lead Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master No.: 3:07-cv-05944-JST
MDL No. 1917

This Document Relates to:

All Indirect Purchaser Actions

**DECLARATION OF LAUREN C.
CAPURRO IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL PURSUANT TO CIVIL
LOCAL RULES 7-11 AND 79-5**

1 I, Lauren C. Capurro, declare:

2 1. I am an attorney duly licensed by the State of California and am admitted to
3 practice before this Court. I am an associate with the law firm Trump, Alioto, Trump &
4 Prescott, LLP and my firm serves as Lead Counsel for the Indirect Purchaser Plaintiffs
5 (“IPPs”) in the above-captioned action. I make this declaration in support of the IPPs’
6 Administrative Motion to File Under Seal Pursuant to Civ. L. R. 7-11 and 79-5(d). Except
7 where otherwise stated, the matters set forth herein are within my personal knowledge and
8 if called upon and sworn as a witness I could competently testify regarding them.

9 2. On June 18, 2008, the Court approved a “Stipulated Protective Order” in
10 this matter (Dkt. No. 306) (the “Protective Order”).

11 3. Pursuant to the Protective Order and Local Civil Rules 7-11 and 79-5(d),
12 IPPs seek to file portions of the following documents under seal:

13 a. Indirect Purchaser Plaintiffs’ Response to Order Re: Objection to Ex
14 Parte Communications and In Camera Review of Billing Records
15 (“Response”), which contains a link for downloading IPP Counsel’s
16 expense audit materials and other backup materials received from
17 IPP Counsel.

18 b. Response, Exhibit 2: December 2, 2015 Email from Lauren Capurro
19 to Special Master providing the link and instructions to the Special
20 Master and his Case Assistant for downloading IPP Counsel’s
21 billing records.

22 c. Response, Exhibit 4: January 7, 2016 Email from Lauren Capurro to
23 Special Master providing the password necessary for downloading
24 the expense audit materials and other backup materials.

25 4. These documents contain links and/or passwords for accessing and
26 downloading IPP Counsel’s unredacted billing records, expense receipts and other backup,
27 as they were provided to the Special Master for *in camera* review.

28 5. Some of IPP Counsel’s billing records contain attorney-client privileged

1 information, attorney work product information, and/or information relating to IPP
2 Counsel's preparations for trial.

3 6. Some of IPP Counsel's expense receipts and other backup contain credit
4 card numbers, account numbers and other sensitive information that would have to be
5 redacted before being made available to the public.

6 7. IPPs have designated their billing and expense records as "Highly
7 Confidential" pursuant to the terms of the Stipulated Protective Order.

8 8. IPPs could not make specific redactions to these documents because they do
9 not have the ability to do so in the usual sense. The Court has ordered these documents
10 produced "as is," just as they were provided to the Special Master for *in camera* review via
11 online repositories. *See* Order Re Objections to Ex Parte Communications and In Camera
12 Review of Billing Records (ECF No. 4508) ("Order") at 1, n. 2. Nevertheless, as noted
13 above, these documents are entitled to protection from public view.

14 9. The Court's Order limited the recipients of IPP Counsel's billing and
15 expense records to objectors Cooper and Scarpulla. The only way to limit access to these
16 objectors is to redact the links and passwords that provide access to IPP Counsel's records.

17 I declare under penalty of perjury that the foregoing is true and correct. Executed
18 this 25th day of March, 2016 at San Francisco, California.

19 /s/ Lauren C. Capurro

20 Lauren C. Capurro
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